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Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

In the Matter of

Preparation for International  
Telecommunication Union  
World Radiocommunication Conferences

ET Docket No. 93-198

Released: June 28, 1993

In reference to the subject Docket, the following comments are submitted on behalf of Family Stations, Inc., whose shortwave station, WYFR, operates 14 high power transmitters from Okeechobee, Florida, to targets in five continents.

WYFR is the largest private U.S. shortwave broadcaster in the

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United States, accounting for approximately 27% of the total of privately operated short wave transmitters, and approximately 30% of the authorized frequency hours.

The subject Docket has requested comments dealing with the manner in which the Radiocommunication Assembly (RA) should address HF broadcasting planning issues within the current allocations, and the expected relationship of RA recommendations to the development of agendas for future World Radiocommunication Conferences(WRCs).

Unfortunately, the Docket does not address the overriding issue facing the private U.S. broadcasting community - namely, the shortage of available shortwave broadcasting spectrum.

Although the FCC has been generous in granting private U.S. broadcasters access to out-of-band frequencies under No. 342 of the Radio Regulations, considerable spectrum that has been made available by WARC remains unusable.

In 1979 a World Administrative Radio Conference (WARC) allocated an additional 780kHz of shortwave broadcasting spectrum. This additional spectrum is still not generally available to broadcasters, because its use was tied to planning the short

wave broadcasting bands. In 1992 a WARC allocated 790kHz more to shortwave broadcasting, to be available in 2007, but again tying its use to planning.

Regrettably, attempts to plan the short wave broadcasting bands at WARC in 1984 and 1987 failed because the requirements submitted by the world's broadcasters far exceeded available spectrum. In addition, constraints were imposed in 1987 which essentially eliminated the possibility of producing viable a priori broadcasting plans. The IFRB has indicated, in recent correspondence, that the Planning System developed by WARC-HFBC-87 has failed, and that it appears to be impossible to use the System to produce satisfactory plans.

Thus, the vitally needed additional 1570kHz allocated to broadcasting since 1979 will not be available to broadcasting for the foreseeable future unless a planning method is found to free it.

We believe that a viable alternative planning method is at hand, and that the 1993 Radiocommunication Assembly should address it. It is a short term planning procedure which, unlike Article 17, enables broadcasters to solve many of their own problems amongst themselves. We also believe that the 1993 WRC should have an item on its agenda concerning HF broadcasting, and that the 1995

WRC consider this alternative planning procedure as a means of freeing vitally needed additional short wave broadcasting spectrum.

A description of the procedure follows:

Since 1990 a group of twenty-two short wave broadcasters has been meeting to coordinate schedules. The next meeting of this group will be held in Hilversum, Holland in mid-August 1993. Broadcasting representatives from the following twenty-two countries will participate: Austria, Bulgaria, Canada, Czech Republic, Denmark, Finland, France, Germany, Holland, Hungary, Israel, Italy, Norway, Poland, Romania, Russia, Slovakia, Sweden, United Kingdom of Great Britain and Northern Ireland, USA\*\*(VOA, RFE/RL), Vatican.

\*\*(The FCC has been invited to attend these coordination conferences on behalf of the private U.S. broadcasters, but has thus far declined the invitations].

Each participant submits to a host country in advance of the conference the schedule to be coordinated (one of two six-month schedules, either Z-summer, or W-winter). The host combines and prints the schedules in booklet form. The booklets are distributed to each participant. Conflicts are identified by

the host, and at the conference, attempts are made by involved parties to resolve as many conflicts as possible. At a recent conference, a total of 1614 co- and adjacent channel conflicts were identified, of which 635(40%) were resolved during three and one-half days of meetings.

The group we have described calls itself the High Frequency Coordination Conference(HFCC). The HFCC represents approximately 18,000 daily frequency hours, or approximately 60% of the world's total high frequency broadcasting effort. It consists primarily of EBU and former OIRT members. HFCC meetings are informal. Meeting sites are chosen at the previous meeting on a voluntary basis. The host, who at the previous meeting has offered to host the next meeting, provides a meeting room, and provides amenities, including translation facilities.

The success the HFCC has had suggests that the formation of additional groups, one for Region 2, another for Region 3 (the HFCC consists principally of Region 1 countries) could go a long way toward solving many of the problems of interference currently facing short wave broadcasters.

Although 90% of all high frequency broadcasting conflicts are intra-regional, and could thus be addressed within each regional conference, some broadcasters, such as BBC, Radio Moscow, VOA,

etc., have interests in all regions of the world. Such inter-regional broadcasters would be free to participate in more than one coordination conference.

Broadcasters who are unable to attend a conference would be empowered to appoint a surrogate to represent their interests at coordination conferences.

Unlike Article 17, the procedure entails direct negotiation between and among broadcasters having conflicts. In general, cooperation and good faith have characterized the meetings, which have left to the broadcasters the task of solving their own problems. All participants have had equal standing at each conference. Such a structure could be particularly appealing to developing countries, since all members are treated equally.

### Summary

We propose that the 1993 Radiocommunication Assembly consider the convening of biennial regional high frequency coordination conferences which would produce short term regional high frequency broadcasting plans. These short term planning conferences would replace the failed HFBC Planning System.

We propose also that the World Radiocommunication Conference, 1993 (WRC-93) include on the agenda of the 1995 WRC an item dealing with HFBC in order to revise Article 17, recognize the HFCC procedures, and, as an adjunct, suppress the Resolutions (e.g., RES 512, WARC-HFBC-87) which enjoin the use of additional high frequency broadcasting spectrum made available at WARC-79).

It is our intent that the HFCC processes would remain outside of the ITU. However, the Radiocommunication Bureau of the ITU could be granted observer status at HFCC conferences.

This would be in accordance with No. 1750 of Article 17 of the Radio Regulations, which states that "Two or more administrations may submit coordinated schedules containing their agreed projected frequency usage."

A handwritten signature in black ink, appearing to read 'Stanley Leinwoll', with a large, stylized initial 'S'.

Stanley Leinwoll

Frequency Manager, WYFR